

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES of AMERICA,

v.

Case 1:20-cr-10307 DJC

GUSTAVO KINRYS,
Defendant.

MOTION TO CONTINUE

Defendant, Gustavo Kinrys, by his counsel, Kevin L. Barron, Esq., respectfully moves the Honorable Court for an order continuing the hearing on Probation's motion to modify conditions of release set for 2:30 this afternoon. Good cause exists to grant this motion. Defendant did not receive notice of or information about this hearing until approximately ten this morning. Notice of hearing was not entered on the docket until this morning. The writer was not notified of his appointment to this case until 8:50 this morning and did not obtain defendant's phone number until 10:45AM. Counsel has transmitted a digital image to the government and the Courtroom Deputy of the defendant that should have been taken just before the time of filing this motion and contain geolocation

information. Defendant reports that he is on Nantucket.

Defendant reports that he is unable to appear at the 2:30 hearing by auto ferry. Defendant has his dog and no care for her on short notice. Defendant reports he has tried to arrange air travel but cannot get a flight until 4:55PM.

Dated: November 15, 2023

Respectfully Submitted,
Gustavo Kinrys, defendant,
By his counsel,
/s/Kevin L. Barron
Kevin L. Barron, Esq.
P.O. Box 290533
Charlestown, MA 02129
(617) 407-6837

CERTIFICATE OF SERVICE

Counsel certifies that he has caused a true copy of this motion to be served today on counsel for all the parties through the CM/ECF system of this District as set forth in the Notice of Electronic Filing and that no party requires service by other means.

/s/Kevin L. Barron
Kevin L. Barron, Esq.